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Mark A. Bilut
Attorney at Law
mbilut@mwe.com
+1 312 984 7670

July 9, 2018

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VIA FEDERAL EXPRESS

Ms. Karen Kirchner
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
Superfund Division, Enforcement and Compliance Assurance Branch
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Patrick Industries, Inc.'s Response to CERCLA Section 104(e) Request for Information
Lusher Street Groundwater Contamination Site, Elkhart, Indiana

Dear Ms. Kirchner:

Enclosed is Patrick Industries, Inc.'s ("Patrick") written response to U.S. EPA's April 30, 2018 Request for Information Pursuant to Section 104(e) of CERCLA with respect to the Lusher Street Groundwater Contamination Site in Elkhart, Indiana ("Site"). In accordance with U.S. EPA's instructions, Patrick's response is being provided within thirty days of receipt. It is important to note that even though U.S. EPA's Request for Information is dated April 30, 2018, it was not received until June 11, 2018 because it was sent by U.S. EPA to an incorrect and outdated mailing address.

This response, and the attached answers to the information requests, are made without any acknowledgement that Patrick is a "responsible party" under CERCLA; without any admission of liability or responsibility under CERCLA or any other statute; and without acknowledgement of the applicability of the authorities referenced in the Section 104(e) letter. While Patrick is supplying U.S. EPA with information, it wishes to state and preserve its objections to certain aspects of the request. First, the request requires identification and inclusion of documents and information not in the possession, custody and control of Patrick, its employees, or persons engaged by or associated with Patrick. Second, the request contends that Patrick is under a continuing obligation to provide information and documents in response to the request. Because we have located no basis for this contention, we assume there is none. If, however, the U.S. EPA does have any basis, please inform us of it and Patrick will respond accordingly.

In accordance with the April 30, 2018 cover letter transmitting the Request for Information, Patrick's response is limited to the properties located at 1819 S. 14th Street and 1700-1706 W. Lusher Street, Elkhart, Indiana. However, Patrick does not understand the following two statements contained in U.S. EPA's April 30, 2018 cover letter: (i) it was not clear to what extent Patrick's July 15, 2011 response provided all information related to the 1819 S. 14th Street property and (ii) EPA understand that since

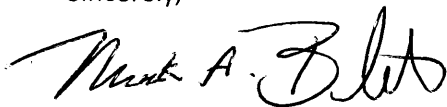
2011 Patrick acquired the business and/or property of CRA-GEN/Woodtec at 1700-1706 W. Lusher Street.

To clarify any confusion on the part of U.S. EPA , the 1819 S. 14th Street property was covered by each and every one of Patrick's responses to the May 3, 2011 Request for Information. In fact, the 1819 S. 14th Street property was explicitly referenced in response to Request Nos. 1, 3, 4 and 7 in the May 3, 2011 information request and documents related to this property were provided with Exhibits E, G and H. As such, Patrick has no additional information to provide related to the 1819 S. 14th Street property. Similarly, the 1700-1706 W. Luster Street property was also covered in the responses to the May 3, 2011 Information Request and documents related to this property were provided in Exhibits D and H. Moreover, U.S. EPA's statement that it understands that Patrick has since acquired the business and/or property of CRA-GEN/Woodtec is incorrect. As noted previously, after acquiring certain assets from CRA-GEN Woodtec in 1998, Patrick subleased this property for about 5 months. Other than this short term sublease in 1998, Patrick has not at any time owned or operated the 1700-1706 W. Lusher Street property.

Without waiving any right to further object to the scope or basis for the Request for Information, Patrick's responses to the May 3, 2011 and April 30, 2018 Requests for Information demonstrate that at no time has Patrick, or any of its predecessors, disposed, arranged for disposal, or otherwise arranged for any chlorinated solvents to become located at, the Site. As noted previously and as reiterated again, Patrick has absolutely no connection to or responsibility for the chlorinated solvent groundwater contamination at the Site.

Feel free to contact me if you have any questions concerning Patrick's response.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Bilut". The signature is fluid and cursive, with the first name "Mark" and last name "Bilut" being clearly legible, and "A." in the middle.

Mark A. Bilut

**Patrick Industries, Inc.'s Response to
U.S. EPA's CERCLA Section 104(e) Request for Information**

Request 1: State the dates during which you or your company have owned, operated, or leased a facility or any part thereof located within the boundaries of the Site and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g. including but not limited to purchase and sale agreements, deeds, leases, etc.).

Response: Patrick's July 15, 2011 response to Request 1 from U.S. EPA's May 3, 2011 Request for Information, and the accompanying exhibits, provided all responsive information and documents related to 1819 South 14th Street and 1700-1706 West Lusher, Elkhart, Indiana. Patrick has no further information to provide.

Request 2: Did you or any other person or entity ever use, purchase, store, treat, dispose, transport or otherwise handle any material containing chlorinated solvents, including but not limited to, trichloroethylene (TCE); trichloroethane (1,1,1-TCA); dichloroethene (trans 1,2-DCE; cis 1,2-DCE; or 1,1-DCE) or tetrachloroethylene (PCE) at a facility within the boundaries of the Site?

Response: Patrick's July 15, 2011 response to Request 2 from U.S. EPA's May 3, 2011 Request for Information provided all responsive information related to 1819 South 14th Street and 1700-1706 West Lusher, Elkhart, Indiana. Patrick has not located any records identifying any use by it of chlorinated solvents at 1819 South 14th Street or 1700-1706 West Street, Elkhart, Indiana.

Request 3: Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundment, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at each facility you or your company have owned, operated, or leased within the boundaries of the Site.

Response: Patrick's July 15, 2011 response to Request 3 from U.S. EPA's May 3, 2011 Request for Information, and the accompanying exhibits, provided all responsive information and documents related to 1819 South 14th Street and 1700-1706 West Lusher, Elkhart, Indiana. See Exhibit G accompanying the July 15, 2011 response for the following environmental reports (i) March 3, 2000 Phase I ESA and Limited Compliance Review for 1819 South 14th Street, prepared by ATC Associates Inc., and (ii) August 4, 2004 Site Investigation Summary Report for 1819 South 14th Street, prepared by ERM.

Request 4: Identify all leaks, spills, or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents that have occurred at or from any facility you or your company have owned, operated, or leased within the boundaries of the Site.

Response: Patrick's July 15, 2011 response to Request 4 from U.S. EPA's May 3, 2011 Request for Information, and the accompanying exhibits, provided all responsive information and documents related to 1819 South 14th Street and 1700-1706 West Lusher, Elkhart, Indiana. Patrick has not located any records specifically identifying any leaks, spills or releases of chlorinated solvents by Patrick on

the 1819 South 14th Street and 1700 – 1706 Lusher Street, Elkhart, Indiana. Patrick previously provided a copy of an August 4, 2004 Site Investigation Summary Report for 1819 South 14th Street, prepared by ERM for Sturgis Iron & Metal in connection with Sturgis Iron & Metal's purchase of this property.

Request 5: Provide copies of all local, state, and federal environmental permits ever granted for any facility (or any part thereof) you or your company have owned, operated, or leased within the boundaries of the Site.

Response: Patrick's July 15, 2011 response to Request 5 from U.S. EPA's May 3, 2011 Request for Information, and the accompanying exhibits, provided all responsive information and documents related to 1819 South 14th Street and 1700-1706 West Lusher, Elkhart, Indiana. See Exhibit H accompanying the July 15, 2011 response for copies of responsive permits related to 1819 South 14th Street and 1700-1706 Lusher Street, Elkhart, Indiana.

Request 6: Identify any persons or entities, other than those responding to this information request, that may have information about the history, use, purchase storage, treatment, disposal, transportation or handling of any materials containing chlorinated solvents at any facilities in the area identified as the Lusher Street Ground Water Site.

Response: Patrick's July 15, 2011 response to Request 6 from U.S. EPA's May 3, 2011 Request for Information, and the accompanying exhibits, provided all responsive information and documents related to 1819 South 14th Street and 1700-1706 West Lusher, Elkhart, Indiana. As previously noted, Patrick is not aware of any such individuals or entities other than those that may be identified as prior or current owners or operators of relevant properties in the documents provided in response to this Section 104(e) request.

Request 7: To the extent you believe that another person is responsible for any leaks, spills or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents at or from any facility you or your company have owned, operated, or leased within the boundaries of the Site identify as such.

Response: : Patrick's July 15, 2011 response to Request 7 from U.S. EPA's May 3, 2011 Request for Information, and the accompanying exhibits, provided all responsive information and documents related to 1819 South 14th Street and 1700-1706 West Lusher, Elkhart, Indiana. As previously noted, Patrick has not identified any specific leaks, spills or releases and, therefore, has not identified any such persons or entities. Patrick previously provided an August 4, 2004 Site Investigation Summary Report for 1819 South 14th Street, prepared by ERM for Sturgis Iron & Metal, which states that there may be groundwater impacts migrating from an unidentified upgradient source.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the persons responsible for

By: 26
Title: President
Date: July 9, 2018

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